

## ***Exhibit B***

**AFFIDAVIT OF JAMES ROWLAND**

STATE OF MONTANA )  
 ) ss.  
COUNTY OF ROSEBUD )

**The affiant, James Rowland, being duly sworn, states as follows:**

1. I am over the age of 21 years and am competent to and do state the facts and matters contained in this affidavit are true and based upon my personal knowledge.
2. In 1969 I was living in Billings, Montana when I joined the Jehovah Witness church. I was baptized in 1969 and on or about 1970, after moving to Hardin, Montana I became a ministerial servant. In 1974 I was appointed to the position of elder or overseer and on or about 1995 I became a Pioneer.
3. Around 1974 I first started hearing rumors that Gunner Hain, a member of our congregation at the time, was sexually abusing children in the congregation. I brought the subject up with other elders, including Martin Svensen, who was presiding elder at the time, but nothing was done.
4. In the late 1970's I heard rumors from church members that elder Harold Rimby, Bruce Mapley Sr as well as Martin Svensen himself were sexually abusing children in the congregation. In early 1984 our congregation was visited by a substitute overseer whose name I can't recall. One day at the Kingdom Hall in Hardin, MT I tried to tell the visiting overseer about the problems with child molestation and sexual abuse that we had within the congregation in general and specifically as it pertained to Martin Svensen and Gunner Hain. Upon hearing what I said the overseer jumped up out of his chair, walked up to me and told me in a very angry voice not to ever mention the subject of pediphilia again. No further action was taken about my complaints. A few months later we had another visiting overseer by the name of Milneck. During an elders meeting I brought up to him the problem of pediphilia on the part of elders in the congregation including Martin Svensen and he too yelled at me and instructed me to never

mention that word in connection with Martin Svensen again. No further action was taken on the part of the church.

5. On or about 1984 the three elders of the Hardin, Montana congregation were Martin Svensen, Jerry Baker (Martin Svensen's son in law) and myself. At that time Martin Svensen was a very powerful person in the congregation. It was his responsibility to report cases of child molestation to the police and to investigate and discipline members accused of child molestation and sexual abuse but instead used his position to down play or cover up allegations including those against Gunner Hain, Bruce Mapley and others. When I personally brought up to my fellow elder Jerry Baker the fact that his father in law, Martin Svensen, was doing horrible things to children and that we had to do something about it Jerry Baker told me that because of who his father in law was he couldn't and wouldn't do anything about it.
6. On or about 1988 or 1989 another overseer whose name I can't recall came to the congregation. I met with this overseer at the Kingdom Hall in Hardin, MT and informed him about the reports of child molestation and sexual abuse at the hands of elders Martin Svensen and members Gunner Hain, Bruce Mapley Sr., and others that I had heard from members of the congregation. A few days later this same overseer drove to my house in Lame Deer, MT and informed me that he had a meeting with the brothers in the Hardin congregation and it was decided that I should resign as elder and to move out of the congregation. Shortly thereafter I left the church.
7. In the late 1980s or early 1990 I came to learn that all three of my daughters had been severely and repeatedly sexually abused and assaulted at the hands of Martin Svensen and Gunner Hain as well as others who performed deviant sexual acts at their direction. Had the Jehovah Witness organization taken appropriate and immediate steps to removed Martin Svensen and Gunner Hain from the congregation and report the matter to the police when they were first put on notice by me in the late 1970's and early 1980's then my daughters would never had been subjected to the horrors they were subjected to. As my faith dictated I told the truth and reported what I knew to be true and I was kicked out for it.

8. Further your affiant sayeth not.

James Rowland  
James Rowland

Subscribed and sworn to before me this 14 day of April, 2020.

Jeanne O Kinzel  
Notary Public

My Commission Expires: 6.13.20

